

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS

GD DEAL HOLDINGS, LLC)
Plaintiff,)
v.)
SURINDER MULTANI; ABBE PROPERTIES, LLC; SAPPHIRE SUPPLY, LLC; JCG INVESTMENTS, LLC; ABBE CAPITAL AND LEASING, LLC; ABBE MANAGEMENT GROUP, LLC; FIFTH THIRD BANK; CITIBANK; VENDOR CAPITAL GROUP; BABAJIPS, LLC; CAPITAL ACCESS & INVESTMENTS, LLC; PETROZONE PETROLEUM II, INC.; G&S PORTAGE, INC.; SAFANPREET MULTANI, in his capacity as trustee for Gurpriya Kaur Multani Irrevocable Trust; GURPAP SINGH MULTANI IRREVOCABLE TRUST, and JAPVI SINGH MULTANI IRREVOCABLE TRUST, Defendants.

Civil Action No. 08-CV-1722

Judge Elaine E. Bucklo

STIPULATION AND PROPOSED ORDER

This Stipulation and Proposed Order is made as of July 11, 2008, by and between Plaintiff GD Deal Holdings, LLC ("GD Deal") and Defendant Citibank ("Citibank") (GD Deal and Citibank are hereinafter collectively referred to as the "Parties"), and is recognized and intended by the Parties as a stipulation and order to be entered by the Court in the above captioned proceedings pending before Honorable Elaine E. Bucklo in the United States District Court for the Northern District of Illinois.

WHEREAS, the Parties are parties to the above captioned proceedings pending before this Court and wish to establish the priorities of their respective liens on the real property located at 24 Bright Ridge Road in Schaumburg, IL (the "Subject Premises") prior to entry of any Order of Sale of the Subject Premises by this Court. This Stipulation and Proposed Order seeks only to establish the lien priorities as between GID Deal and Citibank and does not purport to resolve questions of lien priorities as between the Parties and any other person or entity, not a party to this Stipulation and order.

The Parties hereby agree and stipulate to the following:

(1) Citibank recorded its mortgage, secured by a note dated July 22, 2004, on the Subject Premises on August 9, 2004 with the Cook County Recorder of Deeds. Said mortgage and note are hereinafter referred to as "Citibank's Mortgage and Note."

(2) GD Deal recorded a judgment against Surinder Multani on October 9, 2007 with the Cook County Recorder of Deeds. Said judgment is hereinafter referred to as "GD Deal's Judgment Lien."

(3) Citibank's Mortgage and Note take priority over GD Deal's Judgment Lien.

(4) If any proceeds from the sale of Subject Premises will be distributed to either Citibank or GD Deal, the Parties agree that such proceeds will be distributed to Citibank to satisfy obligations secured by Citibank's Mortgage and Note prior to any distribution to GD Deal.

IN WITNESS WHEREOF, the Parties have caused this Stipulation and Proposed Order to be executed by their authorized representatives as of the date first written above.

GD DEAL HOLDINGS, LLC, Plaintiff

CITIBANK, Defendant

By: /s/ Thomas F. Falkenberg
One of its Attorneys
Scott A. Bachert
William F. Codell
HARNED, BACHERT & DENTON, LLP
324 East Tenth Avenue
Post Office Box 1270
Bowling Green, KY 42102-1270
(270) 782-3938

By: /s/ Nicole J. Highland
One of its Attorneys
Lucia Nale
Diane R. Sabol (6298369)
Nicole J. Highland (6291632)
MAYER BROWN LLP
71 South Wacker Drive
Chicago, IL 60606-4637
(312) 782-0600

Thomas F. Falkenberg
WILLIAMS MONTGOMERY & JOHN LTD.
20 N. Wacker Drive
Chicago, IL 60606-3094
(312) 443-3200

SO ORDERED

Elaine E. Bucklo

Judge Elaine E. Bucklo

Date: 8/7/2008